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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN P. MCGUIGAN and MARISA M.
MCGUIGAN, both individually and as husband
and wife,

Plaintiffs,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY; DOE INSURANCE COMPANY I
through X; DOE DRIVER I through X; DOES
REGISTERED OWNERS I through X; DOES 1
through X; doe EMPLOYEES/AGENTS I through
XX; ROE CORPORATIONS A through Z,
inclusive,

Defendant.

Case No: 2:21-cv-00295-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(Fourth Request)**

Defendant PROGRESSIVE NORTHERN INSURANCE COMPANY, and Plaintiffs

JOHN P. MCGUIGAN and MARISA M. MCGUIGAN, through their respective counsel submit the
foregoing stipulation and order to extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

| Item | Date Completed |
|---|----------------|
| Defendant's Initial Rule 26(a) Disclosures | 05/19/2021 |
| Defendant's First Set of Requests for Admission to Plaintiff John P. McGuigan | 05/19/2021 |
| Defendant's First Set of Requests for Production of Documents to Plaintiffs | 05/19/2021 |
| Defendant's First Set of Interrogatories to Plaintiff John P. McGuigan | 05/19/2021 |
| Plaintiff John McGuigan's Responses to Defendant's | 06/18/2021 |

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| Item | Date Completed |
|--|----------------|
| First Set of Requests for Admission | |
| Plaintiffs Initial Rule 26(a) Disclosures | 07/02/2021 |
| Plaintiff John McGuigan's First Requests for Production to Defendant | 07/02/2021 |
| Plaintiff John McGuigan's Answers to Defendant First Set of Interrogatories | 07/02/2021 |
| Plaintiffs' Responses to Defendant First Set of Requests for Production of Documents | 07/02/2021 |
| Plaintiff John McGuigan's First Set of Interrogatories to Defendant | 07/02/2021 |
| Plaintiff John McGuigan's First Set of Requests for Admissions to Defendant | 07/02/2021 |
| Defendant's Answers to Plaintiff John McGuigan's First Set of Interrogatories | 09/15/2021 |
| Defendant's Answers to Plaintiff John McGuigan's First Set of Requests for Admission | 09/15/2021 |
| Defendant's Responses to Plaintiff John McGuigan's First Set of Requests for Production of Documents | 09/15/2021 |
| Plaintiff John MacGuigan's Amended Answers to Defendant's First Set of Interrogatories | 10/21/2021 |
| Deposition of John P. McGuigan | 10/22/2021 |
| Deposition of Plaintiff Marisa McGuigan | 10/22/2021 |

2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional written Discovery;
- b) The deposition of Dr. Koka;
- c) The deposition of Dr. Gozdzikowski;
- d) Deposition of Michelle Gray of Defendant;
- e) Deposition of Person(s) Most Knowledgeable for Defendant;
- f) Deposition(s) of percipient witnesses;
- g) Deposition(s) of additional treating physicians;
- h) Disclosure of expert witnesses; and
- i) Deposition(s) all expert witnesses.

1 3. Reason Why Discovery Was Not Completed

2 Discovery in this matter is currently scheduled to close on May 6, 2022 with initial expert
3 disclosures currently due by January 7, 2021. Although discovery has diligently progressed since the
4 Scheduling Order was filed on April 14, 2021, additional time is required to work through
5 scheduling issues so that discovery may be completed. The parties would also like additional time
6 to explore settlement options prior to disclosing expert witnesses. The requested extension will
7 allow time for the parties to schedule a settlement conference, if necessary, before experts are
8 disclosed. As such, the parties have agreed to an extension of the discovery deadlines to enable
9 them to complete the remaining discovery.

10 4. Proposed Schedule for Completing Discovery

11 Accordingly, the parties respectfully request that this Court enter an order setting the
12 following discovery plan and scheduling order dates:

| Event | Former Deadline | New Deadline |
|--|------------------|---------------|
| Motions to amend pleadings and add parties | May 11, 2021 | Completed |
| Expert Designations | January 7, 2022 | March 8, 2022 |
| Rebuttal Expert Designations | February 7, 2021 | April 8, 2022 |
| Discovery Cut-off | March 7, 2022 | May 6, 2022 |
| Dispositive Motions | April 7, 2022 | June 6, 2022 |
| Joint Pre-Trial Order | May 6, 2022 | July 5, 2022 |

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Counsel further state that the requested extension of discovery deadlines is not interposed for purposes of delay, but rather for the purposes set forth above.

DATED: December 7th, 2021

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QUALEY LAW GROUP

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IT IS SO ORDERED.

NO FURTHER EXTENSIONS WILL BE GRANTED.



United States Magistrate Judge

DATED: December 8, 2021

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